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December 31, 2014

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF); 14-MC-2543

Dear Judge Furman:

Pursuant to this Court's Order No. 30 § III, Lead Counsel for Plaintiffs and counsel for General Motors LLC ("New GM") have met and conferred regarding the named plaintiffs in the Post-Sale Consolidated Complaint (ECF No. 345) that allege claims with respect to model year 2010 and later vehicles manufactured by New GM, and agree that the following jurisdictions should be included in the choice-of-law briefing contemplated by Order No. 30: Arkansas, California, District of Columbia, Florida, Georgia, Iowa, Illinois, Kentucky, Maryland, Missouri, New Jersey, New York, Oklahoma, and Virginia. The named plaintiffs include Henry Albert, Anna Andrews, Joni Ferden-Precht, Nykea Fox, Ashlee Hall-Abbott, Cynthia Hawkins, Pajja Jackson, Marc Koppelman, Charles David Loterbour, Nicole Mason, David Padilla, Patrick Painter, Randall Pina, Gene Reagan, Jennifer Reeder, Ronald Robinson, Elizabeth Stewart, Dawn Tefft, Courtney Williams, Bruce and Denise Wright, and Nettleton Auto Sales, Inc.

Respectfully submitted,

Richard C. Godfrey, P.C.
Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants